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April 7, 2025

Via ECF

Hon. Edgardo Ramos
United States District Court for the Southern
District of New York
40 Foley Square
New York, New York 10007

Re: *Smith et al. v. Scavino*, 1:24-mc-00566-ER (S.D.N.Y.)

Dear Judge Ramos,

We write on behalf of Movants in the above-captioned matter to enforce a nonparty subpoena *duces tecum* (the “Subpoena”) to Respondent Daniel Scavino Jr. After Movants initiated this action, Mr. Scavino retained new counsel and agreed to produce documents responsive to the Subpoena. *See* ECF No. 13. Mr. Scavino initially produced documents on February 19, 2025 and made a supplemental production on March 28, 2025. Movants are continuing negotiations. In light of this progress, Movants respectfully request that the Court adjourn the April 8, 2025 pre-motion conference until April 22, 2025.

Sincerely,



Joshua S. Margolin
Partner

Cc: Jeremy Schulman; Jeffrey Gavenman